

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

BALCH AND BINGHAM, LLP,)
)
 Plaintiff)
)
 v.)
)
 UNITED STATES OF AMERICA,)
 et al.,)
)
 Defendants)
 _____)

Case Number: 2:14-cv-02041-JHE

ANSWER

Comes now Laurence J. Pino, Esquire, and files this Answer on behalf of the Defendant, Frank Amodeo, individually, and through his court appointed guardian, Charles Rahn.

1. Balch and Bingham were retained by Claire Suzanne Holland (Holland), in a residential construction dispute with respect to a piece of property owned by Holland.
2. Pursuant to that representation, Seven Thousand Eight Hundred Ninety One Dollars and 55/100 (\$7,891.55) of the retainer funds paid for the representation remained unused ("Unused Retainer") in the representation and Balch and Bingham desire to have the funds returned to their rightful owner(s).
3. The property which formed the substance of the representation was owned by Holland and, accordingly, the Unused Retainer belongs to Holland.
4. In the alternative, the Unused Retainer belonged to Amodeo and Holland, as a married couple.
5. Under no circumstances, however, did the Unused Retainer belong to Amodeo in his individual capacity.

WHEREFORE, the undersigned denies that any portion of these funds would be due and owing to the United States of America.

I HEREBY CERTIFY I electronically filed the forgoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to counsel of record.

Submitted this 30th day of October, 2015.

/s/ Laurence J. Pino, Esq.

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